

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

245 PARK MEMBER LLC,

Petitioner,

vs.

HNA GROUP (INTERNATIONAL)
COMPANY LIMITED,

Respondent.

Case No. 1:22-cv-5136-JGK

NOTICE OF APPEAL

Notice is hereby given that Respondent HNA Group (International) Company Limited (“Respondent”) appeals to the United States Court of Appeals for the Second Circuit from the Court’s Opinion and Order entered on May 19, 2023 (ECF No. 149), which, among other things, granted Petitioner’s motion for a turnover pursuant to Federal Rule of Civil Procedure 69 and New York Civil Practice Law and Rules Sections 5225(a) and 5240 (ECF No. 80), and denied Respondent’s motion for relief from the judgment pursuant to Federal Rule of Civil Procedure 60(b) (ECF No. 111).

Dated: May 30, 2023

Respectfully submitted,

KOBRE & KIM LLP

By: /s/ Jeremy O. Bressman

Jeremy O. Bressman
Geoffrey J. Derrick
800 Third Avenue
New York, New York 10022
Telephone: (212) 488-1210
Jeremy.Bressman@kobrekim.com
Geoffrey.Derrick@kobrekim.com

Jacob R. Kirkham (admitted *pro hac vice*)
600 North King Street, Suite 501
Wilmington, Delaware 19801
Telephone: (302) 518-6460
Jacob.Kirkham@kobrekim.com

KEVIN KERVENG TUNG, P.C.

By: /s/ Jiajie Cao

Jiajie Cao
Shengming Shi
Ge Li
Queens Crossing Business Center
136-20 38th Avenue, Suite 3D
Flushing, NY 11354
Telephone: (718) 939-4633
jcao@kktlawfirm.com
sshi@kktlawfirm.com
gli@kktlawfirm.com

*Counsel for Respondent HNA Group (International)
Company Limited*

CERTIFICATE OF SERVICE

I hereby certify that on May 30, 2023, I caused a true and correct copy of the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send a Notice of Electronic Filing to all counsel of record.

/s/ Jeremy O. Bressman

May 30, 2023